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INTEROFFICE MEMORANDUM

DATE: May 14, 1996
TO: H. Finkleman, Engrg/Const/D&D, Bldg. T130F, X5491
FROM: *RJ* Ricky J. Carr, Environmental Safety, Health & Quality, Bldg. T130F, X2653
SUBJECT: SUMMARY OF ASBESTOS WORK REQUIREMENTS FOR B707 D&D -
RJC-011-96
Action: None Required

State of Colorado requirements - Reg. 8, Emission Standards for Asbestos

1. Notification provided to State, at least 10 working days before commencing work, or intention to abate asbestos-containing materials in any amount greater than 32 square feet on surfaces.
2. Seal asbestos-containing waste materials (AWCM) in leak-tight containers while wet and label containers with wording specific warning labels. Dispose of AWCM in accordance with State regulations.

Note: These requirements assume that the project site is considered a non-public access area pursuant to the letter from V. Mani, K-H to D. Brockman, DOE.

OSHA requirements - 29 CFR 1926.1101

1. Inform other employees on the project site of the nature of the work with asbestos, of the existence of and the requirements pertaining to regulated areas, and the measures taken to ensure that employees of other employers are not exposed to asbestos.
2. Removal of asbestos-containing adhesives from the gloveboxes is Class II asbestos work. Class II asbestos work is defined as "removal of asbestos-containing ... construction mastics."
3. All Class II asbestos work shall be conducted within regulated areas. regulated areas shall be demarcated and access limited to authorized personnel. All asbestos work performed within regulated areas shall be supervised by a "competent person". "Competent Person" has to have completed AHERA project designer or supervisor training.
4. Exposure assessments shall be performed in order to evaluate worker exposure to airborne asbestos. The exposure assessments consist of personnel air sampling of employers that are representative of their exposures to airborne asbestos. The exposure assessments consist of initial and periodic monitoring of workers breathing zone concentrations of asbestos. Daily monitoring is required that is representative of each employee's exposure performing work within a regulated area, unless a negative exposure assessment has been determined.

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5. There are specific engineering controls and work practices that are required to be implemented. These include the use of HEPA vacuums, wet methods (unless wet methods are demonstrably infeasible), and ventilation of work areas. There are also work practices and engineering controls that are specifically required for Class II asbestos work. These include the use of critical barriers over all openings to the regulated area or use of another barrier or isolation method which prevents the migration of airborne asbestos from the regulated area, as verified by air monitoring. The use of critical barriers may be avoided if the employer can demonstrate a negative exposure assessment. A negative exposure assessment may be demonstrated for this particular job if there is objective data showing that this activity will not release airborne asbestos fibers in concentrations exceeding the PEL (TWA) and excursion limit. Due to the non-friability of the mastic and past sampling results during similar activities, it appears that the negative exposure assessment requirement can be demonstrated.
6. Alternative work practices and controls may be implemented if the employer can demonstrate by data representing employee exposure during the use of methods and conditions which closely resemble the conditions under which the method will be used and that employee exposure will not exceed the PEL under any anticipated circumstances. The competent person must evaluate and document the work practices and controls are adequate to reduce exposures to below the PEL under all anticipated conditions.
7. Respiratory protection is required during Class II asbestos work where the ACM is not removed in a substantially intact state, work is not performed using wet methods, and where a negative exposure assessment cannot be produced.
8. Training for personnel involved in the Class II asbestos work shall be equivalent to that to the AHERA training for asbestos workers (24 hour AHERA asbestos worker training).
9. Employees involved in Class II asbestos work shall be included in an asbestos medical surveillance program.
10. A "competent person" must supervise the Class II asbestos work. There are requirements that this person must perform. The "competent person" must have completed AHERA training for supervisors (32 hour AHERA asbestos supervisor training).
11. There are additional requirements that may be applicable to the project. These requirements include the use of PPE, hygiene facilities, posting of regulated areas, housekeeping, and recordkeeping.

RJC:clh

cc:

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